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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

USA Commercial Mortgage Company 06-10725 – Lead Case

USA Capital Realty Advisors, LLC

06-10726

**USA Capital Diversified Trust Deed Fund,
LLC**
06-10728

USA Capital First Trust Deed Fund, LLC

**USA Securities, LLC
06-10729**

Debtors.

Jointly Administered

Chapter 11 Cases

Judge Linda B. Riegle Presiding

**MOTION TO EXCEED PAGE
LIMITATIONS ON OFFICIAL
UNSECURED CREDITORS
COMMITTEE'S OBJECTION TO
DEBTOR'S PROFESSIONALS' FEE
APPLICATION**

Date: September 28, 2006

Time: 9:30 a.m.

Affecting:

- .. All Cases
 - or Only:**
 - × USA Commercial Mortgage Company
 - .. USA Capital Realty Advisors, LLC
 - .. USA Capital Diversified Trust Deed Fund, LLC
 - .. USA Capital First Trust Deed Fund, LLC
 - .. USA Securities, LLC

The Official Unsecured Creditors Committee for USA Commercial Mortgage Company (“Unsecured Committee”) hereby moves the Court for an order permitting the Unsecured Committee to exceed the page limitations set by Local Rule of Bankruptcy



1 Procedure 9014(e) on its Objection to Debtor's Professionals' Fee Applications, which is
2 being filed simultaneously herewith.

3 In support of this motion, the Unsecured Committee represents as follows:

4 1. Local Rule of Bankruptcy Procedure 9014(e) requires that, unless otherwise
5 permitted by the Court, motions and supporting memorandum not exceed twenty pages.

6 2. The request to exceed the page limitations here is justified because the
7 Unsecured Committee is objecting to three separate fee applications in one consolidated
8 brief: (1) First Application Of Ray Quinney & Nebeker P.C. ("RQN") For Interim
9 Compensation And Reimbursement Pursuant To 11 U.S.C. § 330 and 331 For The Period
10 Of April 13, 2006 Through July 31, 2006; (2) First Application For Interim Allowance Of
11 Attorney's Fees And Reimbursement Of Expenses Of Schwartzer & McPherson Law Firm
12 From April 14, 2006 through July 31, 2006; and (3) First Interim Application For
13 Compensation And Reimbursement Of Expenses For (I) Mesirow Financial Interim
14 Management, LLC As Crisis Managers For The Debtors, And (II) Thomas J. Allison Of
15 Mesirow Financial Interim Management, LLC As Chief Restructuring Officer For The
16 Debtors And The Employment Of Certain Temporary Employees For The Period Of April
17 14, 2006 Through July 31, 2006.

18 3. Collectively, the fee applications seek compensation of \$4,850,892.20 for
19 fees and expenses, and, with exhibits, are a combined 8 inches in thickness. The three fee
20 applications raise similar legal and factual issues, which are best dealt with in one
21 consolidated brief that exceeds twenty pages (37 pages), rather than three separate but
22 substantially redundant briefs that would otherwise fall within the twenty-page rule.

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For the foregoing reasons, the Unsecured Committee requests that this Court enter the Order attached hereto granting the relief requested herein.

Dated September 15, 2006.

LEWIS AND ROCA LLP

By /s/ RC (#006593)

Susan M. Freeman, AZ 4199 (pro hac vice)

Rob Charles, NV 6593

*Attorneys for Official Unsecured Creditors' Committee
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